



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

Site:	Woburn, MA
Break:	11.9
Other:	119.7

CERTIFIED MAIL

Return Receipt Requested

May 10, 1983

Attn: President
Arlwood, Inc.
295 Mishawum Road
Woburn, MA 01801

Re: Request for information regarding certain activities at
295 Mishawum Road, Woburn, MA.

Dear Dear Sir/Madam:

The U. S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Quality Engineering have been investigating problems of hazardous waste contamination in the city of Woburn, Massachusetts. In particular, we are investigating all potential sources of contamination of Wells G and H. Wells G & H have been proposed for inclusion on the National Priorities List, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9601, et. seq.

In an effort to complete our inquiry, we request that you provide us with the information requested below. Please be advised that this information request is being made pursuant to the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927, and Section 104(e) of CERCLA, 42 U.S.C. §9604(e).

In answering each of the following, please note that the terms "site" and "property" refer to that parcel or those parcels of land and buildings located at 295 Mishawum Road, Woburn, MA, on or in which Arlwood, Inc. conducts or conducted business and/or owns, owned, operates, operated, maintains, maintained, uses, used, leases, leased, controls or controlled property and/or activities. The term "company" refers to Arlwood, Inc. and/or to any of its subsidiaries, affiliated, or related corporations that conduct or conducted business at or have an interest in the land or buildings located at 295 Mishawum Road, Woburn, MA.

Specifically, we request that you provide the following information within thirty (30) days of receipt of this letter.

1. In what year did the company commence operations at the site?
2. Please identify the present owner and all known predecessors of the property on which the company is located at the above-referenced address. Identify the possessor(s) of any easements or right of easement on the property.

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3. If known, please describe activities on and/or prior to use of the property by any predecessors identified in response to question 1, above.

4. Describe all products manufactured at the property since the company assumed ownership and/or occupancy.

5. Describe each and every chemical or product containing chemicals for which quantities greater than 10 gallons were ever purchased or used in the course of the company's operations at the property at any time since the operations commenced until May, 1979. Give product names and generic terms for the chemicals.

6. For each chemical or product containing chemicals listed under question 5 state:

- a. the quantity purchased for each year that the company occupied the property until May, 1979.
- b. the identity of all locations where each chemical or product was stored on-site, and describe the storage and/or processing containers;
- c. the maximum amount of this chemical or product stored on site at any one time;
- d. the frequency of deliveries of this chemical or product; and
- e. whether there have been any spills or disposal of this chemical or product on the property. If so, provide all records and/or a description of each incident. Give dates, the names and amounts of each chemical involved, and the exact locations.

7. For each process (manufacturing, maintenance of building and/or equipment, or otherwise) at the property in which a chemical or chemical product was used during the time the property was owned or occupied by the company until May, 1979, provide the following:

- a. a description of the process and how each chemical was used;
- b. the annual quantity (in measures of volume or weights) of each chemical used;
- c. the concentration of each chemical used;
- d. a description of the waste generated by each process and the contents and quantity of the waste; and
- e. a description of the waste disposal practices for all wastes described in (d), above.

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8. Has trichloroethylene (TCE) or any product containing TCE been used or stored on-site at any time since the company owned and/or occupied the property until May, 1979? If so, please indicate:

- a. each year in which TCE or a product containing TCE was purchased, and the quantity purchased;
- b. identify the storage location of the TCE or the product containing TCE;
- c. describe the containers used for storing TCE or the products containing TCE;
- d. describe the uses of TCE or products containing TCE including all processes in which such products were used, and the quantities and concentrations used;
- e. describe the nature and amount of waste generated by each process and use listed in (d), above. Indicate whether the waste was liquid, solid or gaseous and describe the components of the waste, including all chemicals and by-products of chemicals;
- f. describe the treatment, storage and disposal methods for all above wastes.

9. Has trans-1,2-dichloroethylene or any product containing trans-1,2-dichloroethylene been used or stored on-site at any time since the company owned and/or occupied the property until May, 1979? If so, please indicate:

- a. each year in which trans-1,2-dichloroethylene or a product containing trans-1,2-dichloroethylene was purchased, and the quantity purchased;
- b. identify the storage location of trans-1,2-dichloroethylene or the products containing trans-1,2-dichloroethylene;
- c. describe the containers used for storing trans-1,2-dichloroethylene;
- d. describe the uses of trans-1,2-dichloroethylene or products containing trans-1,2-dichloroethylene including all processes in which such products were used, and the quantities and concentrations used;
- e. describe the nature and amount of waste generated by each process and use listed in (d), above. Indicate whether the waste was liquid, solid or gaseous and describe the components of the waste, including all chemicals and by-products of chemicals;
- f. describe the treatment, storage and disposal methods used for all above wastes.

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10. Has 1, 1,1-trichloroethane or any product containing 1,1,1-trichloroethane been used or stored on-site at any time since the company owned the property? If so, please indicate:

- a. each year in which 1, 1,1-trichloroethane or a product containing, 1, 1,1-trichloroethane was purchased, and the quantity purchased;
- b. identify the storage location of the 1,1,1-trichloroethane or the products containing 1, 1,1-trichloroethane;
- c. describe the containers used for storing 1,1,1-trichloroethane or the products containing 1,1,1-trichloroethane;
- d. describe the uses of 1,1,1-trichloroethane or products containing 1,1,1-trichloroethane, including all processes in which such products were used, and the quantities and concentrations used;
- e. describe the nature and amount of waste generated by each process and use listed in 10(d), above. Indicate whether the waste was liquid, solid or gaseous and describe the components of the waste, including all chemicals and by-products of chemicals; and
- f. describe the treatment, storage and disposal methods used for all above wastes.

11. Has benzene or any product containing benzene been used or stored on-site at any time since the company owned or occupied the property? If so, please indicate:

- a. each year in which benzene or a product containing benzene was purchased, and the quantity purchased;
- b. identify the storage locations of the benzene or the products containing benzene;
- c. describe the containers used for storing benzene or the products containing benzene;
- d. describe the uses of benzene or products containing benzene, including all processes in which such products were used, and the quantities and concentrations used;
- e. describe the nature and amount of waste generated by each process and use listed in 11(d), above. Indicate whether the waste was liquid, solid or gaseous and describe the components of the waste, including all chemicals and by-products of chemicals; and
- f. describe the treatment, storage and disposal methods used for all above wastes.

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12. Has tetrachloroethylene or any product containing tetrachloroethylene been used or stored on site at any time since the company owned or occupied the property? If so, please indicate:

- a. each year in which tetrachloroethylene or a product containing tetrachloroethylene was purchased, and the quantity purchased;
- b. identify the storage locations of the tetrachloroethylene or the products containing tetrachloroethylene;
- c. describe the containers used for storing tetrachloroethylene or the products containing tetrachloroethylene;
- d. describe the uses of tetrachloroethylene or products containing tetrachloroethylene, including all processes in which such products were used, and the quantities and concentrations used;
- e. describe the nature and amount of waste generated by each process and use listed in 12(d), above. Indicate whether the waste was liquid, solid or gaseous and describe the components of the waste, including all chemicals and by-products of chemicals; and
- f. describe the treatment, storage and disposal methods used for all above wastes.

13. Have any other chlorinated organic chemical(s) and/or product(s) containing chlorinated organic chemicals been used, stored, and/or disposed of on-site at any time since the company owned and/or occupied the property until May, 1979? If so, please identify each such chemical(s) and/or product(s) and provide all the information requested in a-f of questions 8 through 12, above, with regard to each of these chlorinated organic chemical(s).

14. Have any solid and/or liquid wastes been treated and/or stored and/or disposed of on the property at any time since the company owned and/or occupied the property until May, 1979? If so:

- a. describe all waste material treated and/or stored and/or disposed;
- b. describe each treatment process used and the annual quantity of waste processed in each treatment process;
- c. describe the containers used for storage;
- d. describe the location on the property of all storage containers;
- e. for each waste product, describe the maximum quantity stored at any one time and the length of time of such storage;

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f. for each waste product, describe the ultimate disposal methods.

15. Were any above or below ground storage containers at the property ever emptied into or onto the ground, ever ruptured or punctured, corroded, over-filled or otherwise compromised so that it leaked onto the ground on or near the property?

16. If the answer to question 15, above, is yes:

a. identify the contents of all material spilled and/or deposited onto the ground;

b. identify the quantity of all material spilled and/or deposited onto the ground;

c. indicate the number of incidents and the dates and/or approximate time periods of each of the occurrences;

d. identify the exact location of all spills and/or deposit sites.

17. If not already addressed in your responses to the above questions, describe in detail any and all incidents at the site that involved spillage, leakage, or accidental or purposeful discharge of any chemical or product containing chemicals used in connection with any manufacturing operation, process, cleaning and/or maintenance operation at anytime since the company owned and/or occupied the property until May, 1979.

18. Has any employee or representative of the company ever disposed of any material, liquid or solid, new or used, in, on, or near the property at any time since the company owned and/or occupied the property until May, 1979?

19. Has any employee or representative of the company ever had knowledge of the disposal by other parties of any material, liquid or solid, new or used, in, on or near the property at any time until May, 1979?

20. If the answer to question 18 or 19 is yes, please provide the following:

a. identify the party(s) that have disposed of the material at the property and the dates and time periods such disposal took place;

b. describe the exact location of all disposed material;

c. describe the content and quantity of all disposed material, indicate whether liquid or solid and identify any chemicals or chemical products and specify concentrations;

d. indicate whether the material was in a container or disposed of directly in or onto the ground or water.

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21. For the period of time the company has owned and/or occupied the property, until May, 1979, indicate each of the years the company had a valid permit for sewer waste disposal. Describe the terms and conditions of any agreements, formal and informal, for the use of the Woburn or the MDC sewer, and state the annual volume for each year in which there was disposal.

22. Did any representative of the company ever test or arrange for the testing of any samples of water, soil, dust, sediment or other samples from the property to determine whether any contaminants were present? if so:

- a. identify and describe the type of each sample (whether water, soil, etc.) and the location from which each sample was taken;
- b. describe test results for each sample. List any contaminants identified, and the concentration of the contaminant;
- c. give the dates the samples were taken; and
- d. identify the laboratory or party that conducted each of the tests.

23. Did any representative of the company ever undertake any efforts to remove and/or arrange for the removal of any materials deposited and/or buried on the premises at the property? If so:

- a. give the dates of all such arrangements and/or efforts;
- b. give the specific locations of all such efforts;
- c. describe the material removed;
- d. indicate how long the material had been present on-site before removal;
- e. describe the removal efforts;
- f. identify all parties involved in removal efforts; and
- g. identify the location where the material was ultimately deposited.

24. Are there any wells on the property?

This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501, et seq. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. §2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by the means of the procedures, set forth by 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice

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to you. You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Please forward the information requested above to:

Lauren Stiller Rikleen
Office of Regional Counsel
U.S. Environmental Protection Agency
Region I
John F. Kennedy Federal Building, Room 2203
Boston, MA 02203

Failure to comply with the above request within thirty (30) days of receipt of this letter, or to adequately justify such failure to comply, may result in an enforcement action by EPA. If you have any questions with regard to the above, please write attorney Lauren Stiller Rikleen at the above address or call her at (617)223-0400.

Sincerely yours,

Paul Keown

Lester A. Sutton, P.E.
Regional Administrator

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P 302 598 203
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Artwood Inc
Hubbs Engine Co.
STREET AND NO.
295 Mishawum Road
P.O., STATE AND ZIP CODE
Woburn MA 01801

POSTAGE	\$
CERTIFIED FEE	€
SPECIAL DELIVERY	€
RESTRICTED DELIVERY	€
SHOW TO WHOM AND DATE DELIVERED	€
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	€
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	€
SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	€

TOTAL POSTAGE AND FEES \$

POSTMARK OR DATE

4-19-83

PS Form 3800, Apr. 1976

SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☒ Show to whom and date delivered.
☐ Show to whom, date, and address of delivery.
☐ RESTRICTED DELIVERY
Show to whom and date delivered.
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Artwood Inc
295 Mishawum Road
Woburn MA 01801

3. ARTICLE DESCRIPTION:
REGISTERED NO. P 302598 203 CERTIFIED NO. INSURED NO.
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Rylin Virgin

4. DATE OF DELIVERY
5-12-83

5. ADDRESS (Complete only if requested)
Woburn MA 01801

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆ GPO: 1978-272-282